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Attorneys for Defendant  
Twitter, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JOHN DOE #1 AND JOHN DOE #2,

Plaintiff,

V.

TWITTER, INC.

**Defendant.**

Case No. 3:21-cv-00485-JCS

**DECLARATION OF LINH K. NGUYEN IN  
SUPPORT OF STIPULATION AND  
[PROPOSED] ORDER ON DEFENDANT  
TWITTER INC.'S ANSWER TO THE FIRST  
AMENDED COMPLAINT**

Judge: Hon. Joseph C. Spero  
Trial Date: Not yet set

1 I, Linh K. Nguyen, declare as follows:

2       1. I am an attorney licensed to practice law in California and am an associate at Cooley,  
 3 LLP and counsel of record for Defendant Twitter, Inc. (“Twitter”) in this matter. I make this  
 4 declaration based on my personal knowledge of this matter and information I obtained following a  
 5 reasonable investigation of the events described below. If called as a witness, I could and would  
 6 testify competently to the matters stated herein.

7       2. I submit this declaration pursuant to Civil Local Rule 6-2(a) and in support of the  
 8 Parties’ Stipulation and Proposed Order re Defendant’s Answer to the First Amended Complaint  
 9 (“FAC”).

10       3. Plaintiffs filed a Complaint in the above-entitled action in U.S. District Court for the  
 11 Northern District of California on January 20, 2021;

12       4. On February 10, 2021, the Parties sought, and the court granted, an extension for  
 13 Twitter to respond to the Complaint and to extend the Initial Case Management Conference;

14       5. Plaintiffs filed the FAC on April 7, 2021;

15       6. On April 13, 2021, the Parties sought, and the court granted, a stipulated briefing  
 16 schedule for Twitter’s motion to dismiss the FAC and to extend the Initial Case Management  
 17 Conference;

18       7. Twitter’s deadline to answer the FAC is September 2, 2021;

19       8. Counsel for Twitter has previously scheduled vacation during Twitter’s response  
 20 time;

21       9. The FAC contains 235 paragraphs of detailed factual allegations and is 55 pages  
 22 long;

23       10. A further Case Management Conference in this matter is currently set for November  
 24 5, 2021;

25       11. This modification would not affect the case schedule as none has been entered.

26       12. This modification will not affect any hearing or proceeding on the Court’s calendar;

27       13. The Parties agree that a two-week extension of Twitter’s deadline to answer the  
 28 FAC is reasonable given the foregoing.

1 I declare under penalty of perjury that the foregoing is true and correct. This declaration  
2 was executed on August 31, 2021 in San Diego, California.  
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Dated: August 31, 2021

/s/ *Linh Nguyen*

Linh K. Nguyen

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